

UNITED STATES DISTRICT COURT

for the
WESTERN DISTRICT OF WASHINGTON

United States of America

v.

Ivan Turogin

Defendant

Case No. 2:22-cr-00185-RSL

AGREEMENT TO FORFEIT PROPERTY TO OBTAIN A DEFENDANT'S RELEASE

To obtain the defendant's release, we jointly and severally agree to forfeit the following property to the United States of America if this defendant fails to appear as required for any court proceeding or for the service of any sentence imposed as may be noticed or ordered by any court considering this matter, or fails to comply with any conditions of release set by the court *(describe property and any claim, lien, mortgage, or other encumbrance on it)*:

Residential villa located in Parekklesia, Limassol, Cyprus valued at approximately €9,900,000.00
The value is evidenced by its listing price by the realtors Century 21.
The house is encumbered by a mortgage with an outstanding loan balance of approximately €1,300,000.00

Ownership. We declare under penalty of perjury that we are this property's sole owners and that it is not subject to any claim, lien, mortgage, or other encumbrance except as disclosed above. We promise not to sell, mortgage, or otherwise encumber the property, or do anything to reduce its value while this agreement is in effect. We deposit with the court the following ownership documents, including any encumbrance documents *(list all documents and submit as attachments)*:

The property is owned by Raduga Zeus Residence Limited, which is a limited company ultimately owned by Denis Turôgin through the corporate structure of Cypriot entities. His ownership of the property and recourse is explained in the attached legal opinion Law Offices L.G. Zambartas LLC

Surety Information. We understand that the court and the United States of America will rely on the surety information in approving this agreement.

Conditions of Release. We state that we have either read all court-ordered conditions of release imposed on the defendant or had them explained to us.

Continuing Agreement. Unless the court orders otherwise, this agreement remains in effect during any appeal or other review until the defendant has satisfied all court notices, orders, and conditions.

Exoneration of Sureties. This agreement is satisfied and ends if the defendant is exonerated on all charges or, if convicted, the defendant reports to serve any sentence imposed.

Forfeiture. If the defendant fails to obey all conditions of release, court notices, and orders to appear, the court will immediately order the property forfeited and on motion of the United States of America may order a judgment of forfeiture against the signing parties and their representatives, jointly and severally, including interest and costs.

AO 100 (Rev. 01/09) Agreement to Forfeit Property to Obtain a Defendant's Release

I swear under penalty of perjury that the above information is true and agree to the conditions of this agreement.

Date: _____

City and state: _____

DENISS TURIGIN
Property owner's printed name

Defendant (if a property owner)

[Signature]
Property owner's signature

Property owner's printed name

Property owner's signature

Property owner's printed name

Property owner's signature

CLERK OF COURT

Date: July 26, 2024

[Signature]
Signature of Clerk or Deputy Clerk

Agreement accepted.

UNITED STATES OF AMERICA
JEHIEL I. BAER, Assistant United States Attorney

Date: July 26, 2024

[Signature]
Assistant United States Attorney's signature

Agreement approved.

Date: July 26, 2024

[Signature]
Judge's signature

(Τύπος Ν. 131Α)

ΚΥΠΡΙΑΚΗ



ΔΗΜΟΚΡΑΤΙΑ

**ΤΜΗΜΑ ΚΤΗΜΑΤΟΛΟΓΙΟΥ
ΚΑΙ ΧΩΡΟΜΕΤΡΙΑΣ**

**Πιστοποιητικό Εγγραφής
Ακίνητης Ιδιοκτησίας**

Επαρχία : 5 ΛΕΜΕΣΟΣ
 Δήμος/Κοινότητα : 125 ΠΑΡΕΚΚΛΗΣΙΑ

Αριθμός Εγγραφής

2/28

Ενορία : 00

Τοποθεσία : ΜΙΤΣΟΑΔΕΣ

Διεύθυνση :

Εκταση : Δεκάρια : 0 Τετρ. Μέτρα : 911

Σύνορα : Όπως φαίνονται στο επίσημο Κτηματικό σχέδιο

Αναφορά Κτηματικού
Σχεδίου

Φύλλο : 54

Σχέδιο : 47W1

Τμήμα : 2

Τεμάχιο : 29

Κλίμακα : 1:2500

ΣΤΟΙΧΕΙΑ ΙΔΙΟΚΤΗΤΗ ΚΑΙ ΣΥΜΦΕΡΟΝ

Διακριτικός Αριθμός	Όνομα και Διεύθυνση	Μερίδιο
223420/3/21	RADUGA ZEUS RESIDENCE LTD ΚΑΡΑΙΣΚΑΚΗ ΑΡ. 13, 3032 , ΛΕΜΕΣΟΣ ΚΥΠΡΟΣ	ΟΛΟ

Ημερομηνία Εγγραφής : 21/04/2008

Αριθμός Φακέλου : 5/Π/1670/2008

ΠΕΡΙΓΡΑΦΗ ΑΚΙΝΗΤΗΣ ΙΔΙΟΚΤΗΣΙΑΣ

ΧΩΡΑΦΙ

Αξία Γεν. Εκτίμησης 01/01/2018: €819.900,00

01/01/2021: €637.700,00

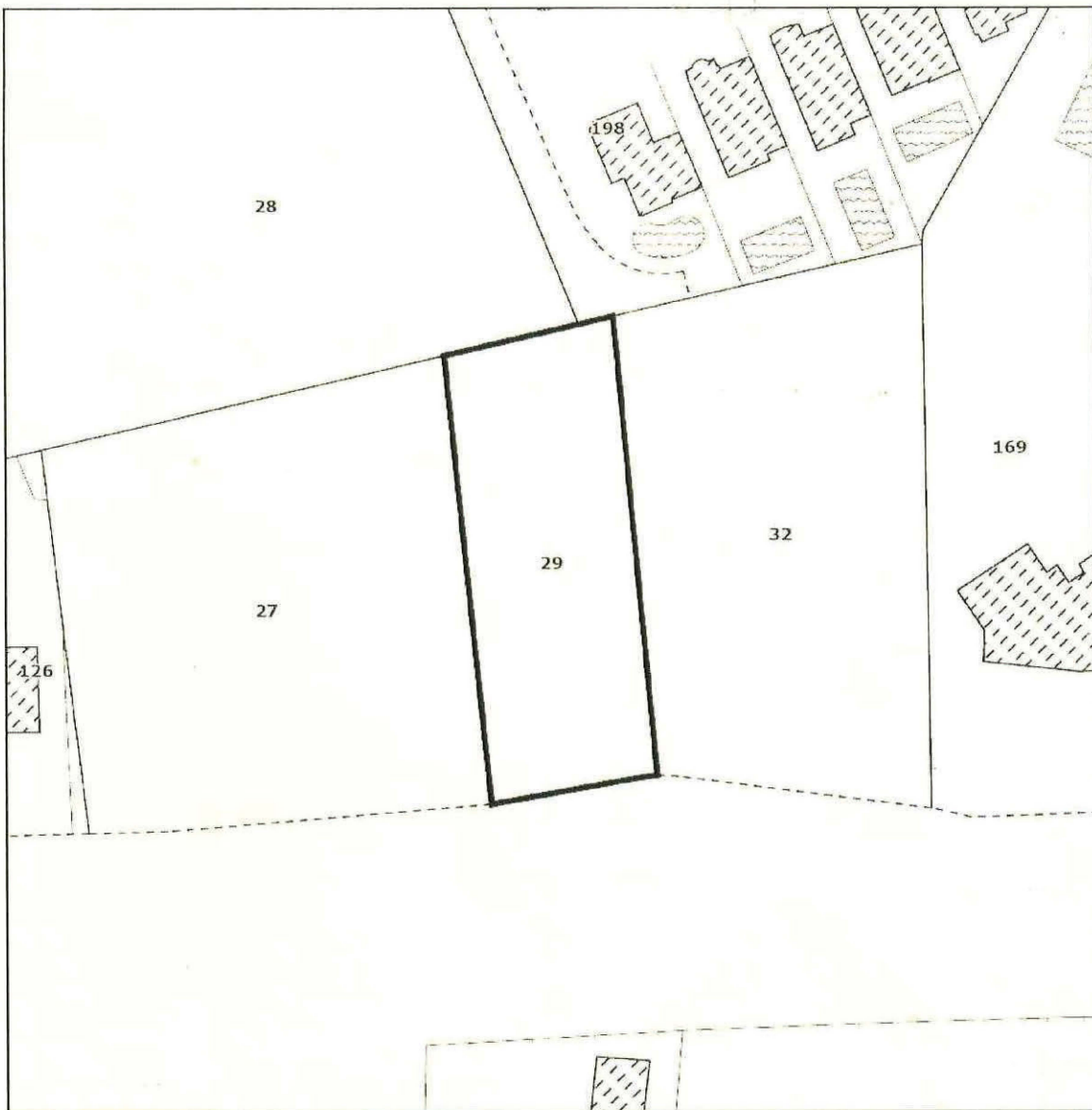
ΣΗΜΕΙΩΣΕΙΣ

ΔΙΚΑΙΩΜΑΤΑ / ΔΟΥΛΕΙΕΣ

Ημερομηνία Έκδοσης:

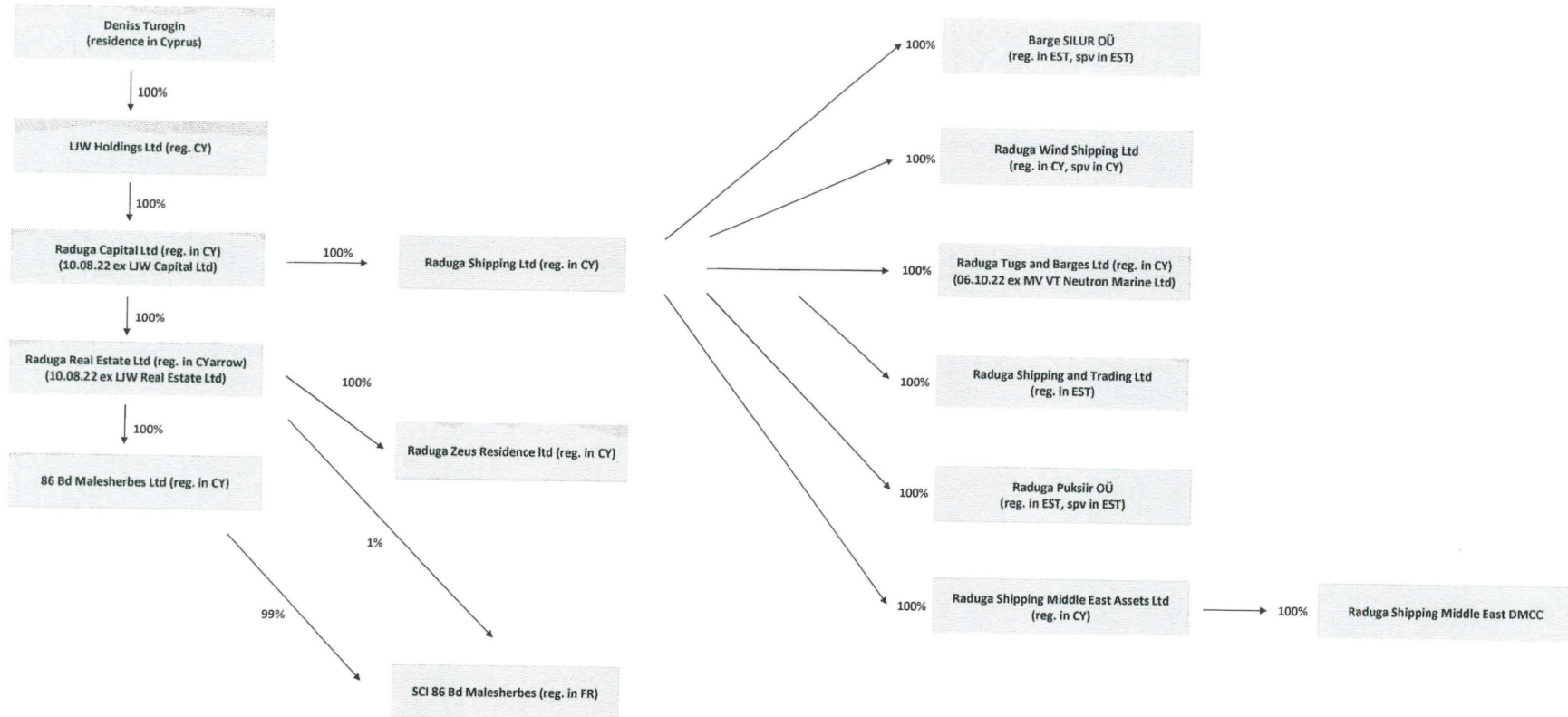
15/01/2024 για Διευθυντή Τμήματος Κτηματολογίου και Χωρομετρίας.

ΜΑΡΙΑ ΕΛΕΥΘΕΡΙΟΥ



ΣΗΜΕΙΩΣΕΙΣ:

1. Όλες οι πληροφορίες που αναγράφονται στο παρόν Πιστοποιητικό, ανταποκρίνονται στην ημερομηνία έκδοσής του.
2. Το σχεδιάγραμμα που υπάρχει, δεν είναι στην κλίμακα που αναγράφεται στο Πιστοποιητικό και δεν μπορεί να χρησιμοποιηθεί για εξαγωγή χωρομετρικών δεδομένων.
3. Στο Πιστοποιητικό δεν αναγράφονται υποθήκες ή άλλες επιβαρύνσεις που πιθανόν να βαρύνουν το ακίνητο ή τον ιδιοκτήτη του.
4. Η έκταση του τεμαχίου που αναγράφεται στο παρόν Πιστοποιητικό πιθανόν να μην είναι ακριβής, σε περίπτωση που αυτή υπολογίστηκε γραφικά από το εν χρήσει κτηματικό σχέδιο.
5. Οι αξίες της Γενικής Εκτίμησης υπολογίζονται για σκοπούς καθορισμού φορολογίας ή/και άλλων τελών και δεν αποτελούν την αγοραία αξία του ακινήτου.



Certified true copy

RA+
 CYPROSERVUS CO. LIMITED
 Secretary
 02/11/2023

ΚΥΠΡΙΑΚΗ
REPUBLIC



ΔΗΜΟΚΡΑΤΙΑ
OF CYPRUS

HE 223420

HE 44

THE COMPANIES LAW, CAP. 113
Section 15(1)

CERTIFICATE OF INCORPORATION

IT IS HEREBY CERTIFIED that,

**PANDOMUS PROPERTY & THEODOROS PANAYIOTOU & SON DEVELOPERS
JOINT VENTURE LIMITED**

has this day been incorporated under the Companies Law, Cap. 113 as a Limited
Liability Company.

Given under my hand in Nicosia on the 20th of February, 2008

.....
Registrar of Companies

TRANSLATED TRUE COPY

for Registrar of Companies
5 September, 2023

ANNITA CHRISTODOULOU

There have been changes of the name

ΚΥΠΡΙΑΚΗ
REPUBLIC



ΔΗΜΟΚΡΑΤΙΑ
OF CYPRUS

HE 223420

HE 46

THE COMPANIES LAW, CAP. 113
Section 19(3)

CERTIFICATE OF CHANGE OF NAME

IT IS HEREBY CERTIFIED that,

**PANDOMUS PROPERTY & THEODOROS PANAYIOTOU & SON DEVELOPERS
JOINT VENTURE LIMITED**

has changed its name by Special Resolution and is hereby named

RADUGA ZEUS RESIDENCE LTD

and that the new name has been entered on the Register of Companies

Given under my hand in Nicosia on the 3rd of September, 2023

.....
Registrar of Companies

TRANSLATED TRUE COPY

for Registrar of Companies
5 September, 2023

ANNITA CHRISTODOULOU



HE 223420

MINISTRY OF ENERGY, COMMERCE AND INDUSTRY
DEPARTMENT OF REGISTRAR OF
COMPANIES AND INTELLECTUAL PROPERTY
NICOSIA

4 September, 2023

CERTIFICATE

RADUGA ZEUS RESIDENCE LTD

It is hereby certified that, in accordance with the records kept by this Department,
the Registered Office of the above Company is situated at:

Karaiskaki, 13
3032, Limassol, Cyprus

For Registrar of Companies

ANNITA CHRISTODOULOU

There have been changes of the name

ΚΥΠΡΙΑΚΗ
REPUBLIC



ΔΗΜΟΚΡΑΤΙΑ
OF CYPRUS

HE 223420

MINISTRY OF ENERGY, COMMERCE AND INDUSTRY
DEPARTMENT OF REGISTRAR OF
COMPANIES AND INTELLECTUAL PROPERTY
NICOSIA

24 October, 2023

CERTIFICATE

RADUGA ZEUS RESIDENCE LTD

It is hereby certified that, in accordance with the records kept by this Department, the following are the Director and Secretary of the above Company:

Director

Country of Nationality

DANA TUROGINA

Estonia

Amathountas, 33
ALAKATOUDI COURT B, Flat/Office 23
4532, Limassol, Cyprus

Secretary

Country of Nationality

CYPROSERVUS CO. LIMITED

Arch. Makariou III, 284
FORTUNA COURT, BLOCK B, 3rd floor, Flat/Office 32
3105, Limassol, Cyprus

For Registrar of Companies

Georgios Trifarides

There have been changes of the name



HE 223420

MINISTRY OF ENERGY, COMMERCE AND INDUSTRY
DEPARTMENT OF REGISTRAR OF
COMPANIES AND INTELLECTUAL PROPERTY
NICOSIA

4 September, 2023

CERTIFICATE

RADUGA ZEUS RESIDENCE LTD

It is hereby certified that, in accordance with the records kept by this Department
the following are the Shareholders of the above Company :

<u>Names and Addresses</u>	<u>Class (value)</u>	<u>No. of Shares</u>
RADUGA REAL ESTATE LTD Karaiskaki, 13 3032, Limassol, Cyprus	ORDINARY (EUR 1.00)	20000

for Registrar of Companies

ANNITA CHRISTODOULOU

There have been changes of the name

ΚΥΠΡΙΑΚΗ
REPUBLIC



ΔΗΜΟΚΡΑΤΙΑ
OF CYPRUS

HE 436786

MINISTRY OF ENERGY, COMMERCE AND INDUSTRY
DEPARTMENT OF REGISTRAR OF
COMPANIES AND INTELLECTUAL PROPERTY
NICOSIA

1 December, 2023

CERTIFICATE

RADUGA REAL ESTATE LTD

It is hereby certified that, in accordance with the records kept by this Department
the following are the Shareholders of the above Company :

<u>Names and Addresses</u>	<u>Class (value)</u>	<u>No. of Shares</u>
RADUGA CAPITAL LTD Karaiskaki, 13 3032, Limassol, Cyprus	ORDINARY (EUR 1.00)	1000

for Registrar of Companies

Georgios Triflarides

There have been changes of the name

APOSTILLE

(Convention de La Haye du 5 octobre 1961)

1. Country: Cyprus

This public document

2. has been signed by Georgios Triftarides

3. acting in the capacity for Registrar of Companies

4. bears the seal/stamp of Department of Registrar of Companies and Intellectual Property, Ministry of Energy, Commerce and Industry

Certified

5. at APOSTILLE - LIMASSOL MJPO OFFICE

6. the 06/12/2023

7. by Despo Xenofontos

8. No LIM MJPO-LIM 000400874/2023

9. Seal/stamp:

10. Signature:




For Permanent Secretary
Ministry of Justice and Public Order
37446071



HE 402384

MINISTRY OF ENERGY, COMMERCE AND INDUSTRY
DEPARTMENT OF REGISTRAR OF
COMPANIES AND INTELLECTUAL PROPERTY
NICOSIA

1 December, 2023

CERTIFICATE

RADUGA CAPITAL LTD

It is hereby certified that, in accordance with the records kept by this Department
the following are the Shareholders of the above Company :

<u>Names and Addresses</u>	<u>Class (value)</u>	<u>No. of Shares</u>
LJW HOLDINGS LIMITED		
Karaiskaki, 13	ORDINARY (EUR 1.00)	1000
3032, Limassol, Cyprus		

for Registrar of Companies

Georgios Triftarides

There have been changes of the name

APOSTILLE

(Convention de La Haye du 5 octobre 1961)

1. Country: Cyprus

This public document

2. has been signed by Georgios Triftarides

3. acting in the capacity for Registrar of Companies

4. bears the seal/stamp of Department of Registrar of Companies and Intellectual Property, Ministry of Energy, Commerce and Industry

Certified

5. at APOSTILLE - LIMASSOL MJPO OFFICE

6. the 06/12/2023

7. by Despo Xenofontos

8. No LIM MJPO-LIM 000400880/2023

9. Seal/stamp:

10. Signature:



For Permanent Secretary
Ministry of Justice and Public Order

12321108



HE 383696

MINISTRY OF ENERGY, COMMERCE AND INDUSTRY
DEPARTMENT OF REGISTRAR OF
COMPANIES AND INTELLECTUAL PROPERTY
NICOSIA

26 January, 2024

CERTIFICATE

LJW HOLDINGS LIMITED

It is hereby certified that, in accordance with the records kept by this Department
the following are the Shareholders of the above Company :

<u>Names and Addresses</u>	<u>Class (value)</u>	<u>No. of Shares</u>
DENISS TUROGIN Amathountas, 33 ALAKATOUDI COURT 2, Flat/Office 23 Agios Tychon (Touristiki Periochi), 4532, Limassol, Cyprus	ORDINARY (EUR 1.00)	1000

for Registrar of Companies

ANNITA CHRISTODOULOU

CENTURY 21
Cyprus

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7 BEDROOM VILLA IN LIMASSOL

[SEND ENQUIRY](#) Parekklesia, Limassol

PRICE	FOR SALE	BEDROOMS	BATHROOMS	INTERNAL AREA	COVERED VERANDAS	PLOT SIZE
€9,900,000		7	5	900 sq.m.	30 sq.m.	840 sq.m.



1/14

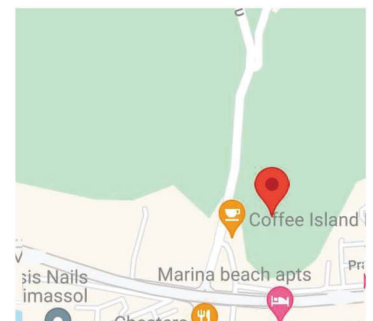
DESCRIPTION

Welcome to our showcase of refined living in Cyprus.

This property features a distinguished private villa that embodies sophistication. This exceptional villa isn't just a home, it's a lifestyle statement, covering 900 sq.m. + 30 sq.m. covered verandas. Each detail exudes lavishness, from the meticulously designed interiors to the carefully landscaped surroundings. With breathtaking views and a location that seamlessly merges privacy with convenience. The location of the property allows for a short distance walk to the beach, additionally, the house

[READ MORE](#)

MAP LOCATION

**ADDITIONAL DETAILS:****FEATURES:**

CENTURY 21.
Cyprus

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CONDITION


Google

PROPERTY AGENT

Victoria Darie +357 25 580 030 victoria.darie@c21cy.com

ENQUIRE NOW

YOU MIGHT ALSO LIKE

6 Bedroom Villa in Limassol**€9,600,000 + VAT** FOR SALE Limassol 6  4  230 sqm  644 sqm**6 Bedroom Villa in Limassol****€9,500,000 + VAT** FOR SALE Germasogeia, Limassol 6  6  854 sqm  1,458 sqm**3 Bedroom Villa in Limassol****€1,580,000 + VAT** FOR SALE Agios Tychonas, Limassol 3  3  161 sqm  42**CENTURY 21.**
Cyprus

COMPANY

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+357 25 58 00 30

Malora Realty Ltd,
Licensed Estate Agent
Reg 1141 License 110/E



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ΤΜΗΜΑ ΚΤΗΜΑΤΟΛΟΓΙΟΥ ΚΑΙ ΧΩΡΟΜΕΤΡΙΑΣ

ΕΠΑΡΧΙΑΚΟ ΚΤΗΜΑΤΟΛΟΓΙΚΟ ΓΡΑΦΕΙΟ

ΛΕΜΕΣΟΥ

05/06/2024



ΠΙΣΤΟΠΟΙΗΤΙΚΟ ΕΡΕΥΝΑΣ ΑΚΙΝΗΤΗΣ ΙΔΙΟΚΤΗΣΙΑΣ
ΜΕ ΕΜΠΡΑΓΜΑΤΑ ΒΑΡΗ

Αριθμός Αιτήσεως: 5/ΠΕΡ/2006/2024

Αιτητής: RADUGA ZEUS RESIDENCE LTD

Διακριτικός Αρ.: 223420/3/21

Διεύθυνση: ΚΑΡΑΙΣΚΑΚΗ ΑΡ. 13,, 3032 ,, ΛΕΜΕΣΟΣ ΚΥΠΡΟΣ

Τύπος F. 17: 3018361

Ημερομηνία: 05/06/2024

Έρευνα για: επιβαρύνσεις στο ακίνητο με αρ. εγγραφής 2/28 στην κοινότητα Παρεκκλησιά.

Όνομα για το οποίο έγινε έρευνα: RADUGA ZEUS RESIDENCE LTD

Διακριτικός Αρ. 223420/3/21

Διεύθυνση ΚΑΡΑΙΣΚΑΚΗ ΑΡ. 13,, 3032 ,, ΛΕΜΕΣΟΣ ΚΥΠΡΟΣ

Αρ.Εγγραφής	Αρ. Φακέλου	Γεωγρ.Περιοχή Τοποθεσία/ Διεύθυνση	Τμήμα	Φύλλο	Σχέδιο	Τεμάχιο	Είδος Ακινήτου	Εμβαδό τ.μ./			Μοίρα ή Συμφέρο	Αξία Γεν.Εκτίμησης
								Καλ.	Ακαλ.	Καλ.		
Αρ.Εγγραφής								Χώρος	Βεραν.	Βεραν.		01/01/2018 01/01/2021
2/28	5/Π/1670/2008	ΛΕΜΕΣΟΣ, ΠΑΡΕΚΚΛΗΣΙΑ, ΜΙΤΣΟΑΔΕΣ	2	54	47W1	29	ΧΩΡΑΦΙ	911			1/1	€819.900,00 €637.700,00
1/04/2008												

ΕΠΙΒΑΡΥΝΣΕΙΣ :		Επηρεαζόμενο Μερ.		Ποσό/Τιμή Πώλησης	Εξοδα	Τόκος	Επιτόκιο	Αρ. Παραπομπής
Αρ. Φακέλου	Ημ. Αποδοχής	στο Ακίνητο						
5/Y/533/2024	12/03/2024	1/1		€2.000.000,00			Κυμαινόμενο	

Υποθήκη

Δανειστής 217050/3/21 EUROBANK CYPRUS LIMITED

ΑΡΧΙΕΠΙΣΚΟΠΟΥ ΜΑΚΑΡΙΟΥ Γ, 41, 1065, ΑΓΙΟΣ
ΑΝΤΩΝΙΟΣ, ΔΗΜΟΣ ΛΕΥΚΩΣΙΑΣ, ΛΕΥΚΩΣΙΑ

ΠΕΙΡΑΗ: * Ιδιοκτησία που δεν φέρει ημερομηνία εγγραφής δεν είναι εγγεγραμμένη.
Κάθε πιστοποιητικό πρέπει να φέρει ημερομηνία, υπογραφή και σφραγίδα.

Σφραγίδα



.....
(..... ANTONH MANAPH)

Για Διευθύντ
Τμήματος Κτηματολογίου και Χωρομετρίας